

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , Debtors. ¹	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)
IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO SALES TAX FINANCING CORPORATION (COFINA), Debtors.	PROMESA Title III No. 17 BK 3284-LTS

**THE BANK OF NEW YORK MELLON'S INFORMATIVE
MOTION REGARDING JANUARY 16-17, 2019 HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Bank of New York Mellon ("BNYM"), as trustee, through its undersigned counsel, hereby submits this informative motion, pursuant to the Court's *Order Regarding*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Procedures for Attendance, Participation and Observation of January 16, 2019 Hearing

Regarding (1) the 9019 Settlement Approval Motion, (2) COFINA Plan of Adjustment

Confirmation Motion, and (3) Dispute Regarding Section 19.5 of Plan [ECF No. 4647 in Case No. 17-3283], and respectfully represents as follows:

1. Eric A. Schaffer and Louis M. Solomon of Reed Smith LLP will appear in person on behalf of BNYM at the January 16-17, 2019, hearing in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767, to address the following matters:

- a. *Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation;*
- b. Dispute regarding obligations in connection with Section 19.5 of the Proposed Plan; and
- c. Any other matters raised by the Court or in response to any statements made by any party in connection with the above-captioned Title III proceedings.

2. C. Neil Gray and Luke A. Sizemore of Reed Smith LLP and Albéniz Couret-Fuentes of Sepulvado, Maldonado & Couret also will be present in the San Juan courtroom on behalf of BNYM.

WHEREFORE, BNYM respectfully requests that the Court permit BNYM to appear and be heard at the January 16-17, 2019, hearing.

[Remainder of page intentionally left blank.]

Dated: January 11, 2019
San Juan, Puerto Rico

Respectfully submitted,
SEPULVADO, MALDONADO &
COURET

By: /s/ Albéniz Couret-Fuentes
Elaine Maldonado-Matías
USDC-PR No. 217309
Albéniz Couret-Fuentes
USDC-PR Bar No. 222207
José Javier Santos Mimoso
USDC-PR Bar No. 208207
304 Ponce de León Ave.—Suite 990
San Juan, P.R. 00918
Telephone: (787) 765-5656
Facsimile: (787) 294-0073
Email: emaldonado@smclawpr.com
Email: acouret@smclawpr.com
Email: jsantos@smclawpr.com

REED SMITH LLP
Eric A. Schaffer (*pro hac vice*)
Luke A. Sizemore (*pro hac vice*)
225 Fifth Avenue, Suite 1200
Pittsburgh, PA 15222
Telephone: (412) 288-3131
Facsimile: (412) 288-3063
Email: eschaffer@reedsmith.com
Email: lsizemore@reedsmith.com

REED SMITH LLP
Louis M. Solomon (*pro hac vice*)
C. Neil Gray (*pro hac vice*)
599 Lexington Avenue, 22nd Floor
New York, NY 10022
Telephone: (212) 521-5400
Facsimile: (212) 521-5150
Email: lsolomon@reedsmith.com
Email: cgray@reedsmith.com

*Counsel for The Bank of New York Mellon,
as trustee*

CERTIFICATE OF SERVICE

I hereby certify that, on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Albéniz Couret-Fuentes _____

Albéniz Couret-Fuentes
USDC-PR Bar No. 222207
SEPULVADO, MALDONADO &
COURET
304 Ponce de León Ave.—Suite 990
San Juan, P.R. 00918
Telephone: (787) 765-5656
Facsimile: (787) 294-0073
Email: acouret@smclawpr.com